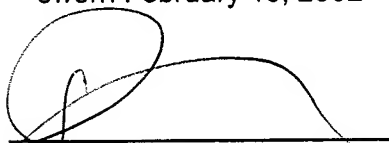


This is Exhibit D of
the Affidavit of Lindsay Lorimer
sworn February 15, 2002


A commissioner, etc

ATTENTION:

All individuals who were incarcerated at Oak Ridge Division of the Penetang Pyschiatric Hospital in Penetanguishine, Ontario [hereinafter "Penetanguishene"] between 1968 and 1979 and who participated in the Motivation, Attitude, Participation Program ("M.A.P.");

All individuals who were incarcerated at Penetanguishene between 1968 and 1979 and who participated in the Total Encounter Capsule Program (the "Capsule"); and

All individuals who were incarcerated at Penetanguishene between 1965 and 1979 and who participated in Defence Disruptive Therapy ("D.D.T").

**LEGAL NOTICE PURSUANT TO THE
CLASS PROCEEDINGS ACT, 1992, S.O. 1992,C.6**

THE NATURE OF THE LAWSUIT

A class action has been commenced in the Ontario Superior Court of Justice against Dr. Elliott Thomson Barker, Dr. Gary J. Maier and Her Majesty the Queen in Right of Ontario in respect of alleged human experimentation conducted on patients at the Penetang Psychiatric Hospital, Oak Ridge Division between 1965 and 1979.

The proceeding has been brought on behalf of Danny A. Joannis and Vance Hamilton Egglestone (the "Representative Plaintiff"), by their solicitors, *Rochon Genova*. The Representative Plaintiffs claims damages against the Defendants for assault, negligence and breach of fiduciary duty. The Defendants deny the Plaintiffs' allegations and have stated that they will defend the action and will deny any wrongdoing and liability for damages. This notice does not mean that the Court has taken a position as to the likelihood of recovery on the part of any Plaintiff, or as to the merits of the claims or defences asserted by either side.

This notice is being provided because you may be a member of the Class whose rights may be affected by the lawsuit.

THE CLASS

By Court Order, the Class to which this lawsuit applies has been defined as follows:

“(a) All individuals who were incarcerated at Oak Ridge Division of the Penetang Pyschiatric Hospital in Penetanguishine, Ontario [hereinafter “Penetanguishene”] between 1968 and 1979 and who participated in the Motivation, Attitude, Participation Program (“M.A.P.”);

(b) All individuals who were incarcerated at Penetanguishene between 1968 and 1979 and who participated in the Total Encounter Capsule Program (the “Capsule”); and

(c) All individuals who were incarcerated at Penetanguishene between 1965 and 1979 and who participated in Defence Disruptive Therapy (“D.D.T.”).”

THE COMMON ISSUES

At present the class action will determine the following issues:

1. Whether human experimentation took place at Pentaguishine, and if so, what was the nature, duration and extent of that experimentation?
2. Whether the Defendant Doctors breached a duty to Class members?
3. Whether the Defendant Crown breached a duty to Class members?
4. Whether the Class is entitled to an award of punitive damages from one or both of the Defendants?

PARTICIPATION AND EXCLUSION FROM THE CLASS

If you wish to remain a member of the class, you do not have to do anything at this time. If you wish to obtain more information about your rights as a Class member you may contact the solicitors for the Representative Plaintiffs, in writing at the address below:

Rochon Genova
Barristers & Solicitors
121 Richmond St. West, Suite 903
Toronto, ON
M5H 2K1
Tel: (416) 363-1867

Toll Free 1-866-881-2292
Fax: (416) 363-0263
www.rochongenova.com

IF YOU WISH TO EXCLUDE YOURSELF FROM THE CLASS PROCEEDING ("opt out") you must write to Rochon Genova (at the address listed above) specifying your desire to opt out of the class proceeding. Your letter to Rochon Genova stating your desire to opt out of the class must contain your name, address, telephone number, and signature, and must clearly state your desire to opt out of this class proceeding. Notice of your decision to opt out must be received by Rochon Genova within 90 days of the date of this notice.

ANY JUDGMENT OBTAINED ON THE COMMON ISSUES IN THIS ACTION, WHETHER FAVOURABLE OR NOT, WILL BIND ALL CLASS MEMBERS WHO DO NOT OPT OUT OF THIS ACTION.

FINANCIAL CONSEQUENCES

The class proceeding shall deal with the common issues, as outlined above. No Class member, other than the Representative Plaintiffs, will be liable for costs with respect to the determination of these common issues. However, once the Court has determined the common issues, it may be necessary that the individual members of the Class participate in individual proceedings to determine issues which are not common to the Class in order to establish their claim. If this is necessary, each member of the Class may have to bear costs of such individual proceedings and, if unsuccessful, could be liable to pay a portion of the Defendants' costs incurred with respect to such individual proceedings.

Class members may be entitled to receive financial compensation for the Defendants if the class action is successful.

The Representative Plaintiffs have entered into an agreement with their solicitors whereby fees and disbursements related to the trial of the common issues will be payable only in the event of success in the class action. Any fees charged by the solicitors for the representative Plaintiffs must be approved by the Court.

For further information, please write *Rochon Genova* at the address listed below:

Rochon Genova
Barristers & Solicitors
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Toronto, ON
M5H 2K1
Tel: (416) 363-1867
Toll Free: 1-866-881-2292
Fax: (416) 363-0263
www.rochongenova.com

Dated: _____